9/16/03 -2648

Capito, Bonnie P. (EFDLANT)

From: Jackson, Rodger W. (EFDLANT)
Sent: Monday, September 22, 2003 9:07 AM
To: Capito, Bonnie P. (EFDLANT)
Subject: FW: Revised Site 85 Decision Document

AR

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-----Original Message-----
From: Doug.Bitterman@ch2m.com [mailto:Doug.Bitterman@ch2m.com]
Sent: Tuesday, September 16, 2003 2:33 PM
To: ChristopherJK@cherrypoint.usmc.mil; townsend.gena@epa.gov; george.lane@ncmail.net; JacksonRW@efdlant.navfac.navy.mil; thornton.michelle@epamail.epa.gov; Stancin.Martin@ch2m.com; GeorgeL100@aol.com
Subject: RE: Revised Site 85 Decision Document

Team:

Jeff and I discussed his comment below and we have opted to leave the text unchanged with respect to the issues raised. Unlike the 5th bullet, each specific constituent discussed in the 2nd bullet exceeds a different set of criteria, making it very difficult to wordsmith the details without muddling the overall message. The intent is to present the overall conclusions in this document, and point the reader to the details in the report, which will be contained in an Appendix. Also, the statement about the 2XAB exceeding screening criteria, while true in all cases for groundwater, is generally not the case with soils.

We do, however, proposes a minor modification to bullet 2 with the intent of making a statement more clear. Please see the attached to see if everyone agrees with the proposed change.

Thanks!

Doug

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-----Original Message-----
From: Christopher GS12 Jeffrey K [mailto:ChristopherJK@cherrypoint.usmc.mil]
Sent: September 16, 2003 10:46 AM
To: Bitterman, Doug/VBO
Cc: townsend.gena@epa.gov; george.lane@ncmail.net; JacksonRW@efdlant.navfac.navy.mil; thornton.michelle@epamail.epa.gov; Martin, Stacin/VBO; GeorgeL100@aol.com
Subject: RE: Revised Site 85 Decision Document

Doug,

I do have one additional comment... I would suggest additional wording to indicate which regulatory screening criteria has been exceeded and that the 2XBG also exceeds same. Basically, something similar to the 5th bullet covering inorganics in groundwater.

Thanks,
Jeff

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Environmental Affairs Department
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-----Original Message-----
From: Doug.Bitterman@ch2m.com [mailto:Doug.Bitterman@ch2m.com]
Sent: Tuesday, September 16, 2003 10:08 AM
To: GeorgeL100@aol.com; townsend.gena@epa.gov; christopherjk@cherrypoint.usmc.mil; JacksonRW@efdlant.navfac.navy.mil; george.lane@ncmail.net; Stancin.Martin@ch2m.com; thornton.michelle@epamail.epa.gov
Subject: Revised Site 85 Decision Document

Team:

Attached is a PDF of a revision to the Draft Site 85 Decision Document based on Gena's comments. The file shows the revisions in track changes mode so that you can see what proposed changes I have made. In a nutshell, I split the first bullet on surface soil conclusions into two parts: organic and inorganic constituents. To the new 2nd bullet I added a sentence or two and made minor modifications to (hopefully) better explain the rationale with regard to comparing the data to background concentrations.

Please see what you think and let me know your comments. We are still hoping to finalize this for team signature at the upcoming partnering meeting, so your timely response would be greatly appreciated. Don't hesitate to contact me if you have any questions.

Thanks!

Doug

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Draft

Site Screening Area (SSA) Decision Document for Site 85

Marine Corps Air Station
Cherry Point, North Carolina

Contract Task Order 0085

September 2003

Prepared for

Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia

Under the:

LANTDIV CLEAN II Program
Contract N62470-95-D-6007

Prepared by

CH2MHILL

Contents

CONCURRENCE FOR NO FURTHER ACTION
SIGNATURE PAGE

Site Screening Area (SSA) Site 85
Marine Corps Air Station, Cherry Point, North Carolina

From 2001 to 2002, the Navy and Marine Corps Air Station (MCAS) Cherry Point, in partnership with the U.S. Environmental Protection Agency (USEPA) Region IV and the North Carolina Department of Environment and Natural Resources (NCDENR), conducted Site Screening Process (SSP) investigation activities for the above-referenced Site. A description of the SSP investigation activities and the investigation results, conclusions, and recommendations are provided in the document *Final Site Screening Process Report, Site 85, Marine Corps Air Station, Cherry Point, North Carolina*, dated November 2002. This report is included as Appendix A of this Decision Document.

The major conclusions and recommendations of the Final SSP Report for Site 85 form the basis for this Concurrence for No Further Action (NFA), and are summarized below:

- In surface soil, none of the organic compounds detected at concentrations above regulatory screening criteria (benzo(a)pyrene and dieldrin) appear to be significant due to their relatively low concentrations, a low frequency of detection (each compound detected in only one sample), and the fact that none of these compounds were detected in groundwater.
- With regard to inorganic constituents in surface soil, a conservative benchmark used for screening purposes is twice the average concentration of a particular constituent in the MCAS Cherry Point background data set. Using this conservative screening approach as a starting point for data evaluation, the inorganic constituents iron, lead, and manganese exceeded twice the average MCAS Cherry Point background concentrations and one or more regulatory screening criteria in at least one sample. However, although iron and manganese concentrations exceeded twice the average background concentrations in 2 of 4 samples, all concentrations are well within the range of background concentrations at MCAS Cherry Point, and are ~~not~~ likely ~~to be indicative of site-related contamination~~representative of natural conditions. Also, lead concentrations exceeded twice the average background concentration in 2 of 4 samples, but the maximum lead concentration of 82.6 mg/kg is well below the NCDENR action level of 400 mg/kg for lead in soils.
- In subsurface soil, no constituents of concern were identified, as all constituents detected above regulatory screening criteria were consistent with MCAS Cherry Point background concentrations.
- In groundwater, the most downgradient monitoring well (85TW04-01) contained traces of benzene (0.37 µg/L) and vinyl chloride (0.65 µg/L) at concentrations slightly exceeding the EPA Region 9 Tapwater PRGs of 0.35 µg/L for benzene and 0.041 µg/L for vinyl chloride, as well as the North Carolina 2L Groundwater Standard of 0.015 µg/L for vinyl chloride. Based on the location of this sample and the specific compounds

detected, the presence of organic contamination in this sample is likely the result of migration from the adjacent Operable Unit 2 (OU2), which includes a 10-acre landfill with the documented presence of significant benzene and vinyl chloride. A monitoring well a short distance upgradient of 85TW04-01 in the western part of Site 85, 85GW01, was sampled in 1999 and 2002 as part of OU2 long-term monitoring activities, and was found to contain similar traces of benzene and vinyl chlorine. Moreover, the concentrations of these compounds at Site 85 are too low to warrant remedial action, and the frequency of detection does not indicate that Site 85 groundwater is significantly contaminated with organic compounds.

- Of the inorganic constituents detected in Site 85 groundwater, only iron and manganese exceeded twice the average MCAS Cherry Point background concentrations and the EPA Region 9 Tapwater PRGs and North Carolina 2L Groundwater Standards in one or more samples. However, twice the average background concentrations of iron and manganese at MCAS Cherry Point also exceed the EPA Region 9 Tapwater PRGs and the North Carolina 2L Groundwater Standards.
- All of Site 85, including the location of temporary well 85TW04 where low-levels of benzene and vinyl chloride were detected, is within the land use control boundary for aquifer use prohibition that is part of the final remedy for OU2. Also, the Site 85 monitoring well 85GW01 cited above is included in the OU2 long-term monitoring network, and will be sampled annually in that capacity as part of the natural attenuation remedy for OU2 groundwater. Therefore, the low levels of benzene and vinyl chloride detected in the extreme western portion of Site 85 that are related to OU2 are being addressed by the remedy that is in place for OU2.
- No further investigation activities are recommended at Site 85.

Based upon the conclusions and recommendations of the SSP Report, as summarized above, it is the consensus of the MCAS Cherry Point Installation Restoration Program Partnering Team, including representatives of the Department of Navy (DoN), MCAS Cherry Point, USEPA Region IV, and NCDENR, that Site 85 requires no further action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended. In the event contamination posing an unacceptable risk to human health or the environment is discovered after the issuance of this Decision Document, the MCAS Cherry Point Installation Restoration Program Partnering Team agrees to re-evaluate the Site as deemed necessary. Based on this concurrence for no further action, this Site will be identified for NFA in the Federal Facilities Agreement (FFA) under development for MCAS Cherry Point.

Gena Townsend Date
Remedial Project Manager
Federal Facilities Branch
USEPA Region 4

George Lane Date
Environmental Engineer II
Superfund Section, Federal Remediation Branch
NCDENR

Rodger Jackson Date
Navy Technical Representative
Naval Facilities Engineering Command
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Jeff Christopher Date
Program Manager, Installation Restoration
Environmental Affairs Department
MCAS Cherry Point, North Carolina